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October 27, 2021

**VIA ECF**

Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Yunseo Lee, et al  
Case No.: 20-cr-648 (ALC)

Dear Judge Carter:

We are the attorneys for Yunseo Lee in the above-referenced matter and hereby submit this letter request to modify her travel restrictions to SDNY, EDNY, and New Jersey District pursuant to the terms and conditions of her release, so that she could make a job-related business trip to Missouri to carry out inventory control of the company's warehouse and packaging vendors.

Ms. Lee was arrested and arraigned on August 6, 2020, on a complaint alleging that she violated U.S. export control laws while employed as a sales clerk at a New Jersey electronic components company. On December 1, 2020, Ms. Lee was indicted with her co-defendant on similar charges and the matter is pending discovery and potential plea negotiations.

Currently, she is released on a \$200,000 PRB bond, travel restrictions, surrender of her passport, and other standard conditions of release. During the pendency of her case, Ms. Lee has been in full compliance with the terms and conditions of her release, and the Court recently removed her curfew and GPS monitoring with the addition of two moral suasion cosigners to her bond.

Pretrial Services and the government have no objections to our request to amend Ms. Lee's travel restrictions for a business trip on November 4 to 5, 2021 to Missouri, and with the itinerary to be provided to Pretrial Services prior to her departure. We hereby request the Court so ordered the modification of Ms. Lee's travel restrictions for out-of-state business travel.

Thank you for your consideration.

The application is ☒ granted  
☐ denied.

Andrew L. Carter Jr, U.S.D.J.

Dated: November 2, 2021  
NY, New York

Respectfully submitted,

Hugh H. Mo

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